

#108 TAD/MKD/WTG/rcs

2/7/08

2007S-0284

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION**

JEFFREY SIEGEL, Administrator of the Estate
of MOUSTAPHA AKKAD,
deceased;
SOOHA AKKAD, Individually;
SUSAN GITELSON, Special Administrator of
the Estate of RIMA AKKAD MONLA,
deceased; and
MICHAEL BUTLER,

Plaintiffs,

v.

H GROUP HOLDING, INC., a corporation
("H GROUP");
GLOBAL HYATT CORPORATION,
a corporation ("GLOBAL");
HYATT INTERNATIONAL
CORPORATION, a corporation ("HI");
HYATT CORPORATION, a corporation
("HYATT CORP.");
HYATT HOTELS CORPORATION,
a corporation ("HYATT HOTELS");
HYATT INTERNATIONAL(EUROPE
AFRICA MIDDLE EAST) LLC
("HYATT EAME");
AIC HOLDING CO., a corporation ("AIC");
HYATT INTERNATIONAL HOLDINGS
CO., a corporation ("HIH");
HI HOLDINGS LUXEMBURG S.a.r.l.
("HI LUX");
ZARA INVESTMENT (HOLDING) CO.
("ZARA"); and
AMMAN TOURISM INVESTMENT
COMPANY, LTD. ("ATIC");

No. 07 C 6830

Judge John W. Darrah

Magistrate Judge Susan E. Cox

Defendants.

**PLAINTIFFS' AGREED MOTION TO REMOVE DOCUMENT NUMBER 36
AND TO RE-FILE SAID DOCUMENT UNDER SEAL
PURSUANT TO LOCAL RULES 5.8 AND 26.2**

Plaintiffs, JEFFREY SIEGEL, Administrator of the Estate of MOUSTAPHA AKKAD, deceased; SOOHA AKKAD, Individually; SUSAN GITELSON, Special Administrator of the Estate of RIMA AKKAD MONLA, deceased; and MICHAEL BUTLER, move to remove their electronically filed Reply to Defendant, Hyatt International (Europe Africa Middle East) LLC's Memorandum of Law in Opposition to Plaintiffs' Motion to Remand (Document Number 36) and to re-file said reply under seal pursuant to Local Rules 5.8 and 26.2.

In support, Plaintiffs state:

Plaintiffs electronically filed their Reply to Defendant, Hyatt International (Europe Africa Middle East) LLC's Memorandum of Law in Opposition to Plaintiffs' Motion to Remand ("Reply") in a timely fashion on February 5, 2008. Said document is labeled as "Document Number 36" on the electronic filing system. Plaintiffs' Reply contains quotations from and citations to a confidential Hyatt document that is the subject of Agreed Proposed Protective Order.

Defendant filed its Agreed Motion for Protective Order on February 5, 2008. This Motion is scheduled to be heard in front of Judge Darrah on February 12, 2008. If and when Judge Darrah enters the Protective Order, the parties request to remove Plaintiffs' Reply from the electronic filing system and re-file it under seal pursuant to Local Rules 5.8 and 26.2.

WHEREFORE, plaintiffs, JEFFREY SIEGEL, Administrator of the Estate of MOUSTAPHA AKKAD, deceased; SOOHA AKKAD, Individually; SUSAN GITELSON, Special Administrator of the Estate of RIMA AKKAD MONLA, deceased; and MICHAEL BUTLER, move to remove their electronically filed reply to Defendant, Hyatt International (Europe Africa Middle East) LLC's Memorandum of Law in Opposition to Plaintiffs' Motion to Remand and to file said reply under seal pursuant to Local Rules 5.8 and 26.2.

Respectfully submitted,

/s/ William T. Gibbs

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Firm I.D. No. 108